

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JUUL LABS, INC.,

Plaintiff,

v.

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

Civil Action No. 1:19-cv-00715-LO-IDD

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S
MOTION TO UNSEAL DOCUMENTS**

Plaintiff Juul Labs, Inc., (“Plaintiff” or “JLI”), by counsel, submits this Memorandum in Support of its Motion to Unseal Documents, and states as follows:

On June 12, 2019 the Court granted Plaintiff’s motion to seal: (1) Schedule A to the Complaint, which includes a list of eBay account names used by Defendants; (2) Exhibit 2 to the Complaint, which contains screenshots of Defendants’ Internet Store listings; (3) Exhibit 3 to the Complaint, which contains screenshots of Defendants’ Internet Store payment pages; and (4) Plaintiff’s memorandum of law in support of its *ex parte* motion for a temporary restraining order including temporary asset restraint and expedited discovery. D.I. 25 (“Seal Order”). The Seal Order directed Plaintiff to move to unseal those documents once the temporary restraining order had been served on the relevant parties and the requested actions taken.

Also, on June 07, 2019, the Court issued an Order: (i) directing PayPal, Inc. (“PayPal”) to freeze the accounts associated with the email accounts identified in Schedule A to the Complaint; and (ii) granting Plaintiff leave to serve expedited discovery on PayPal to determine the amounts

of any monies held by PayPal in association with the eBay accounts identified in Schedule A to the Complaint, as well as any name, address, telephone number, and bank account associated with such PayPal accounts. D.I. 22 (“Temporary Restraining Order”).

Plaintiff has now exhausted all reasonably available avenues to effectuate the asset freeze and expedited discovery of PayPal. Accordingly, Plaintiff no longer needs to maintain the secrecy of the Defendants’ eBay account names or product listings.

For the foregoing reasons, Plaintiff requests that this Court grant this Motion and any other such relief as this Court deems proper.

Date: June 14, 2019

/s/ Monica Riva Talley

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